

I. HEADING

DATE: MARCH 13, 1992
SUBJECT: HILLSDALE DRUM SITE
HILLSDALE, ST. HELENA PARISH, LA
FROM: CHARLES FISHER, OSC EPA REGION 6 ERB
TO: DIRECTOR, ERD
REGION 6
POLREP#: NO. 2

II. BACKGROUND

SITE#: 2X
DELIVERY ORDER#: 0035-06-024
RESPONSE AUTHORITY: CERCLA
ERNS#: N/A
NPL STATUS: NON-NPL
STATE NOTIFICATION: STATE REFERRAL
ACTION MEMO STATUS: ACTING RA EXECUTED 03-02-92
START DATE: 02/14/92
DEMOBILIZATION DATE: 3-13-92
COMPLETION DATE: N/A

III. SITE INFORMATION

A. INCIDENT CATEGORY

CERCLA INCIDENT CATEGORY: Active Waste Management Facility.

B. SITE DESCRIPTION

1. Site Description

The Hillsdale Drum Site is composed of three separate subsites, all operated and/or managed by the same companies and individuals. These subsites have been labeled as Site A, Site B, and Site C.

The Hillsdale Drum Site (Site B) is located at Rural Route 1, Box 87, Amite, Louisiana, 70422. The site is on Louisiana State Road 441, approximately 3/4 mile south of the town of Hillsdale (population approximately 150). There are two residences approximately 1/4 to 1/2 mile north of the site along SH 441. Land use surrounding the site is primarily rural, with cattle raised for dairy and beef production.

The P.J. Thomas Road site (Site A) is located on P.J. Thomas Road, approximately 1/2 mile east of La SH 1045, approximately 1/2 miles south of Hillsdale. The site is approximately 100 yards off the road and 75 yards north of a house trailer residence. There is a second residence approximately 250 yards to the southwest and separated from the site by a heavy grove of



trees. There is no actual street address for this site. There is a small lake/cattle tank/pond located approximately 100 yards northwest of the site. This water body is used for fishing by local residents and eventually drains to the Amite River.

The warehouse site (Site C) is located on Laurel Avenue in the City of Amite. The warehouse is located in the southwestern portion of the city. There are 10 residences within 1/4 mile of the warehouse. Surrounding the warehouse are other warehouses and a railroad track.

IV. RESPONSE INFORMATION

1. Current Situation

The Louisiana Department of Environmental Quality (LDEQ) was notified of the site by an anonymous caller on February 5, 1992. LDEQ and the State Police started investigations of the J.P. Thomas Road site (Site A) and the La Hwy 441 site (Site B) on February 6, 1992. Initial investigations of the site(s) indicated the presence of incompatible materials (acids, bases, flammables, oxidizers, and corrosives) stored together presenting a fire and explosion hazard. LDEQ requested EPA assistance on February 12, 1992. At the same time, LDEQ requested that the Governor of Louisiana issue a notice of imminent endangerment. Once the Governor of Louisiana issued the notice, LDEQ instructed the St. Helena Sheriff's Office to evacuate the family living near the J.P. Thomas Road site (SITE A). LDEQ is continuing investigations of the activities at all locations under state RCRA authority.

The Louisiana State Police obtained search warrants and issued several arrest warrants in conjunction with their criminal investigation of the case. Entry into the two initial sites (Sites A & B) was made under the State Police Search Warrant authority, and entry into the Amite warehouse site (Site C) was made under a "Consent to Search" agreement.

Due to the multi-state nature of the potential criminal investigations, the Louisiana State Police has requested assistance from EPA CID.

2. Removal Actions To Date

All materials from Site A and Site C have been consolidated and restaged at Site B. The full or partially full drums have been staged inside the lounge/warehouse and the empty drums have been staged outside. Approximately 316 drums of potential hazardous waste were removed from Site A. Included in this number was a tractor trailer loaded with 158 drums. A majority of these drums did contain waste. The two Site A burn piles have been sampled and sent to the laboratory, along with background samples. A total of 12 soil samples were collected from the burn piles and surrounding area. The collected samples are being analyzed for

volatile organics, semi-volatile organics, priority pollutant metals, pesticides\PCBs, and organophosphorus\pesticides. After the sampling was completed, the contents of both burn piles were placed into two rolloff boxes. In addition, one to three inches of topsoil was removed from beneath the burn piles and loaded into the rolloff boxes and moved to Site B. One pond, located 100 yards west of Site A, was sampled and a pond located approximately 2 miles north of Site A was sampled to collect background information. The water and sludge samples were analyzed for volatile organics, semi-volatile organics, priority pollutant metals, and pesticides\PCBs. A fence has been constructed around Site A area to prevent public access and potential contact with contaminants that may remain in the soil. The family living near Site A was temporarily relocated and has since been allowed to return.

Site C consisted of 33 drums of possible hazardous waste and two bags that contained possible asbestos abatement material. Three piles of packing material were located on the floor at the Site C warehouse and samples were collected from each pile and a bag of the abatement material. Samples were also collected from the area under the asbestos bags and the fiber drums. A number of the drums had to be repacked into 85 gallon overpacks due to the deteriorating condition of the containers. The piles of packing material were repacked into salvage drums and restaged at Site B. This brought the total to 63 drums of material that was removed for Site C. A fence is surrounding the site and it is secure from public access.

Site B contained 365 drums of potential hazardous waste. All full or partially full drums were staged in the lounge\warehouse and the empty drums were staged outside. A total of 152 samples have been sent to the laboratory for analyses. The samples were collected from drums that originated from all three sites. The samples are being analyzed for RCRA characteristics and the results will be used for site characterization and enforcement actions. Field hazard categorization (HazCat) has been conducted on all samples and the results are being used to restage the drums according to hazard class. Approximately 100 drums of vermiculite or like material have been sieved to ensure that all lab packs were fully identified and inventoried.

The bobtail truck that was labeled with Polychlorinated Biphenyl (PCB's) stickers contained six drums. A sample was taken from one of the drums and a chlor-n-oil test showed a positive response to PCB's. On Thursday, March 5, 1992 two employee's from Southern Environmental Services were given permission to take the truck from the site. A fence has been constructed around Site B to restrict unauthorized access and 24 hour security is present.

3. Potential for Continued State/Local Response

LDEQ and State Police will be continuing their respective

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investigations. EPA has assumed the lead in the removal action; however, data collected from both field HazCat, full priority pollutant scan, and RCRA characteristic analysis will be shared by all parties involved. The St. Helena Sheriff's Office is providing 24-hour site security.

C. NEXT STEPS

Demobilization from the site is scheduled for 3-13-92. The second phase activities of transportation and disposal is scheduled to start on approximately 5-13-92, but no later than 60 days from demobilization. During this break EPA enforcement will be notifying PRPs and offering them the opportunity to transport and dispose of their waste(s).

D. KEY ISSUES

On Tuesday, March 10, 1992 a meeting was held that included EPA, LDEQ, Louisiana State Police and Mr. Bill Crawford (company operator\PRP). The meeting was requested by Mr. Crawford in order to gain information about the status of the Hillsdale Site and the release of 71 drums\containers he received from a PRP in Baton Rouge, LA. The manifest document that he wrote, indicated that 69 drums\containers were listed as non-hazardous waste and 2 drums\containers were listed as corrosive liquid waste. The PRP has informed LDEQ that the 71 drums\containers Mr. Crawford received were listed as hazardous waste. EPA stated that if Mr. Crawford could obtain a letter\document or laboratory analysis from the generator\PRP stating that the drums were listed as non-hazardous waste, then the 71 drums would be released, otherwise the drums would remain on-site. Mr. Crawford also requested that his personal belongings located at the site be returned and it was stated that if he would submit a list of these personal articles, they would be released to him.

V. COST INFORMATION

Cost To Date

Cleanup Contractor	\$135,272
TAT/EPA.....	\$ 31,632
CLP Analytical Services	N/A
REAC	N/A
Regional Laboratory Services	N/A
IAGs	N/A
Letter Contracts	N/A
Total	\$166,904
Project Ceiling	\$561,000
Percent of Project Funds Remaining	29.98%

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